

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

<p>In re:</p> <p>ROMAN CATHOLIC ARCHBISHOP OF BALTIMORE,</p> <p style="text-align: center;">Debtor.¹</p>	<p>Chapter 11</p> <p>Case No. 23-16969-MMH</p>
<p>OFFICIAL COMMITTEE OF UNSECURED CREDITORS</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>ROMAN CATHOLIC ARCHBISHOP OF BALTIMORE,</p> <p style="text-align: center;">Defendant.</p>	<p>Adversary Proceeding No. 25-00084</p>

**DEFENDANT/COUNTERCLAIMANT’S OBJECTIONS TO THE OFFICIAL
COMMITTEE OF SECURED CREDITORS’ EXHIBITS IN CONNECTION WITH
MOTION FOR SUMMARY JUDGMENT AND MOTION FOR JUDICIAL NOTICE**

Defendant/Counterclaimant Roman Catholic Archbishop of Baltimore (the “Debtor”) objects to the introduction of the following exhibits, as identified on the Official Committee of Unsecured Creditors’ (the “UCC”) exhibit list, ECF No. 88, in connection with the hearing scheduled for October 6, 2025:

Exhibit	Description	Fed. R. Evid.	Objection
P-02	Attorney General Report	201, 801, 802, 805	The exhibit and its contents are out of court statements being offered for their

¹ The last four digits of the Debtor’s federal tax identification number are 1535. The Debtor’s principal place of business is located at 320 Cathedral Street, Baltimore, Maryland 21201.

			<p>truth, and are thus inadmissible hearsay.</p> <p>The exhibit is not the proper subject of judicial notice, as it contains legislative facts, rather than adjudicative facts. <i>See It's My Party, Inc. v. Live Nation, Inc.</i>, No. CIV. JFM-09-547, 2012 WL 78795, at *2 (D. Md. Jan. 10, 2012) ("Rule 201 limits judicial notice to adjudicative facts"). While the Court may <i>consider</i> legislative facts, they should not be judicially noticed, nor admitted as evidence.</p>
P-04	Website Showing Senate Bill 686	201, 801, 802, 805	<p>The exhibit and its contents are out of court statements being offered for their truth, and are thus inadmissible hearsay.</p> <p>The exhibit is not the proper subject of judicial notice, as it contains legislative facts, rather than adjudicative facts. <i>See It's My Party, Inc. v. Live Nation, Inc.</i>, No. CIV. JFM-09-547, 2012 WL 78795, at *2 (D. Md. Jan. 10, 2012) ("Rule 201 limits judicial notice to adjudicative facts"). While the Court may <i>consider</i> legislative facts, they should not be judicially noticed, nor admitted as evidence.</p>
P-05	Website Showing House Bill 1	201, 801, 802, 805	<p>The exhibit and its contents are out of court statements being offered for their truth, and are thus inadmissible hearsay.</p> <p>The exhibit is not the proper subject of judicial notice, as it contains legislative facts, rather than adjudicative facts. <i>See It's My Party, Inc. v. Live Nation, Inc.</i>, No. CIV. JFM-09-547, 2012 WL 78795, at *2 (D. Md. Jan. 10, 2012) ("Rule 201 limits judicial notice to adjudicative facts"). While the Court may <i>consider</i> legislative facts, they</p>

			should not be judicially noticed, nor admitted as evidence.
P-06	MCC Website Who We Are Section	201, 801, 802, 805	<p>The exhibit and its contents are out of court statements being offered for their truth, and are thus inadmissible hearsay. MCC is not an agent or employee of Debtor and its statements are not those of Debtor.</p> <p>The exhibit is not the proper subject of judicial notice, as it contains legislative facts, rather than adjudicative facts. <i>See It's My Party, Inc. v. Live Nation, Inc.</i>, No. CIV. JFM-09-547, 2012 WL 78795, at *2 (D. Md. Jan. 10, 2012) ("Rule 201 limits judicial notice to adjudicative facts"). While the Court may <i>consider</i> legislative facts, they should not be judicially noticed, nor admitted as evidence.</p>
P-07	MCC Website Post on HB 1378	201, 801, 802, 805	<p>The exhibit and its contents are out of court statements being offered for their truth, and are thus inadmissible hearsay. MCC is not an agent or employee of Debtor and its statements are not those of Debtor.</p> <p>The exhibit is not the proper subject of judicial notice, as it contains legislative facts, rather than adjudicative facts. <i>See It's My Party, Inc. v. Live Nation, Inc.</i>, No. CIV. JFM-09-547, 2012 WL 78795, at *2 (D. Md. Jan. 10, 2012) ("Rule 201 limits judicial notice to adjudicative facts"). While the Court may <i>consider</i> legislative facts, they should not be judicially noticed, nor admitted as evidence.</p>
P-14	Transcript of 2/23/23 Maryland State Senate Hearing	201, 801, 802, 805	The exhibit and its contents are out of court statements being offered for their truth, and are thus inadmissible hearsay.

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P-14-1	Audio File of 2/23/23 Hearing (previously provided to Court)	201, 801, 802, 805	<p>The exhibit and its contents are out of court statements being offered for their truth, and are thus inadmissible hearsay.</p> <p>The exhibit is not the proper subject of judicial notice, as it contains legislative facts, rather than adjudicative facts. <i>See It's My Party, Inc. v. Live Nation, Inc.</i>, No. CIV. JFM-09-547, 2012 WL 78795, at *2 (D. Md. Jan. 10, 2012) ("Rule 201 limits judicial notice to adjudicative facts"). While the Court may <i>consider</i> legislative facts, they should not be judicially noticed, nor admitted as evidence.</p>
P-15	Voting Record for Maryland Senate Bill 686	201, 801, 802, 805	<p>The exhibit and its contents are out of court statements being offered for their truth, and are thus inadmissible hearsay.</p> <p>The exhibit is not the proper subject of judicial notice, as it contains legislative facts, rather than adjudicative facts. <i>See It's My Party, Inc. v. Live Nation, Inc.</i>, No. CIV. JFM-09-547, 2012 WL 78795, at *2 (D. Md. Jan. 10, 2012) ("Rule 201 limits judicial notice to adjudicative facts"). While the Court may <i>consider</i> legislative facts, they should not be judicially noticed, nor admitted as evidence.</p>

P-16	Transcript of 3/13/23 Maryland State Senate Hearing	201, 801, 802, 805	<p>The exhibit and its contents are out of court statements being offered for their truth, and are thus inadmissible hearsay.</p> <p>The exhibit is not the proper subject of judicial notice, as it contains legislative facts, rather than adjudicative facts. <i>See It's My Party, Inc. v. Live Nation, Inc.</i>, No. CIV. JFM-09-547, 2012 WL 78795, at *2 (D. Md. Jan. 10, 2012) (“Rule 201 limits judicial notice to adjudicative facts”). While the Court may <i>consider</i> legislative facts, they should not be judicially noticed, nor admitted as evidence.</p>
P-16-1	Audio File of 3/13/23 Hearing (previously provided to Court)	201, 801, 802, 805	<p>The exhibit and its contents are out of court statements being offered for their truth, and are thus inadmissible hearsay.</p> <p>The exhibit is not the proper subject of judicial notice, as it contains legislative facts, rather than adjudicative facts. <i>See It's My Party, Inc. v. Live Nation, Inc.</i>, No. CIV. JFM-09-547, 2012 WL 78795, at *2 (D. Md. Jan. 10, 2012) (“Rule 201 limits judicial notice to adjudicative facts”). While the Court may <i>consider</i> legislative facts, they should not be judicially noticed, nor admitted as evidence.</p>
P-17	Transcript of 3/28/23 Maryland State Senate Hearing	201, 801, 802, 805	<p>The exhibit and its contents are out of court statements being offered for their truth, and are thus inadmissible hearsay.</p> <p>The exhibit is not the proper subject of judicial notice, as it contains legislative facts, rather than adjudicative facts. <i>See It's My Party, Inc. v. Live Nation, Inc.</i>, No. CIV. JFM-09-547, 2012 WL 78795, at *2 (D. Md. Jan. 10, 2012) (“Rule 201 limits judicial notice to adjudicative facts”). While the Court</p>

			may <i>consider</i> legislative facts, they should not be judicially noticed, nor admitted as evidence.
P-17-1	Audio File of 3/28/23 Hearing (previously provided to Court)	201, 801, 802, 805	<p>The exhibit and its contents are out of court statements being offered for their truth, and are thus inadmissible hearsay.</p> <p>The exhibit is not the proper subject of judicial notice, as it contains legislative facts, rather than adjudicative facts. <i>See It's My Party, Inc. v. Live Nation, Inc.</i>, No. CIV. JFM-09-547, 2012 WL 78795, at *2 (D. Md. Jan. 10, 2012) ("Rule 201 limits judicial notice to adjudicative facts"). While the Court may <i>consider</i> legislative facts, they should not be judicially noticed, nor admitted as evidence.</p>

Dated: October 2, 2025

/s/ Philip T. Evans

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*Attorneys for the Debtor and Debtor In
Possession*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of October, 2025, a true and accurate copy of the foregoing was served via the Court's CM/ECF e-filing system on all counsel of record.

/s/ Philip T. Evans
Philip T. Evans